

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE

IN RE:)
)
LG ORNAMENTALS, LLC) **CASE NO. 20-03560-MH3-11**
)
Debtor)

RESPONSE TO CHAPTER 11 PLAN
AND CONDITIONAL ACCEPTANCE OF PLAN

Comes now **Robert H. Waldschmidt, Trustee for the Bankruptcy Estate of James Whitfield Livingston (20-03559-MH3-7)** – and as the sole equity security holder of the Debtor - and responds to the Chapter 11 Plan filed by the Debtor:

1. The Trustee would request that on # 4 (page 6) the 2nd, 3rd and 4th sentences be deleted and replaced with the following: “100% of the equity interest in the Debtor (stock or LLC interest) in the Debtor is being held by the Bankruptcy Estate of James Whitfield Livingston (Case # 20-03559). Robert H. Waldschmidt is the Trustee in that Case.”

2. The Trustee would further request that on Part G – Final Decree (pages 10/11) an additional sentence be added as follows: “However, a Final Decree will not be entered in this case until the Trustee for the Bankruptcy Estate of James Whitfield Livingston (Case # 20-03559) has sold, transferred, abandoned, or otherwise removed the equity interest in the Debtor from the Bankruptcy Estate of James Whitfield Livingston. “

3. If the following amendments are incorporated into the Debtor’s Chapter 11 Plan, then the Trustee ACCEPTS the Plan. (If said changes are not made, the Trustee rejects the Plan.)

RESPECTFULLY SUBMITTED:

/s/ Robert H. Waldschmidt

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